REMARKS

Claims 1-14, 17, 18 and 20 are pending in the case. The Examiner's reconsideration of the rejections is respectfully requested in view of the amendments and the remarks.

Claims 1-18 and 20 have been rejected under 35 U.S.C. 102(b) as being anticipated by DeRose et al. (U.S. Patent No. 5,983,248). The Examiner stated essentially that DeRose teaches all the limitations of claims 1-18 and 20.

Claim 1 claims, *inter alia*, "a first document processor for deriving internal structure information of each of said plurality of related sub-documents in response to said control information, wherein said first document processor derives said internal structure information by identifying at least one of, (a) objects within a document and (b) divisions between objects." Claim 12 claims, *inter alia*, "a first document processor for deriving internal structure information of each of said plurality of related sub-documents in response to said control information." Claim 17 recites, *inter alia*, "a first document processor for deriving internal structure information of each of said plurality of related sub-documents to identify structural object elements in response to said control information."

DeRose teaches a system and method for generating representations, indexing and rendering an electronic document having a descriptive markup and hierarchical content (see col. 1 lines 17-25). DeRose does not teach "a first document processor for deriving internal structure information of each of said plurality of related sub-documents in response to said control information" as claimed in claims 1 and 12, and essentially as claimed in claim 17. The document of DeRose is composed of content objects or

elements (see Figure 3). Each element describes a function or meaning of the text it includes (see col. 7, line 63 to col. 8, line 9, and col. 16, lines 35-41). DeRose does not teach deriving internal structure information of each of element. DeRose's elements form a document. The document structure is given by the hierarchy of elements. Nowhere does DeRose teach that the internal structure of the elements is derived. More particularly, DeRose teaches a document and its structure or elements; DeRose does not teach an internal structure of the elements. Therefore, DeRose fails to teach "a first document processor for deriving internal structure information of each of said plurality of related sub-documents in response to said control information" as claimed in claims 1 and 12, and essentially as claimed in claim 17.

Further, with respect to claim 1, DeRose does not teach "wherein said first document processor derives said internal structure information by identifying at least one of, (a) objects within a document and (b) divisions between objects." DeRose teaches that a structure of a document is given by the hierarchy of elements. Assuming, arguendo, that the elements are subdocuments, DeRose does not teach identifying objects within the elements or divisions between objects. More particularly, the elements of DeRose do not have elements or objects of their own. Thus, DeRose fails to teach "wherein said first document processor derives said internal structure information by identifying at least one of, (a) objects within a document and (b) divisions between objects" as claimed in claim 1.

Claims 2-11 depend from claim 1. Claims 13 and 14 depend from claim 12. Claim 18 depends from claim 17. Claims 15 and 16 have been cancelled. The dependent

claims are believed to be allowable for at least the reasons given for the respective independent claims.

The Examiner's reconsideration of the rejection is respectfully requested.

For the forgoing reasons, the present application, including claims 1-18 and 20, is believed to be in condition for allowance. The Examiner's early and favorable action is respectfully urged.

Respectfully Submitted,

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